



THE CITY OF NEW YORK
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March 28, 2008

BY FACSIMILE (212) 805-7920

The Honorable Shira A. Scheindlin
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

USDC SDNY
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Re: Jamie Favaro, et. al. v. City of New York, et al., 08 Civ. 1855 (SAS)

Your Honor:

I am Senior Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, representing defendants City of New York, NYPD Police Commissioner Raymond Kelly and the New York City Police Department in the above-referenced matter. I write with respect to the above-referenced matter in which plaintiffs allege that their constitutional rights were violated by defendants when their bicycles were allegedly seized. Defendants respectfully request an extension of time to answer or otherwise respond to this complaint from April 7, 2008 until June 6, 2008. Plaintiff has consented to this request for an extension of time.

There are several reasons for seeking an enlargement of time in this matter. In accordance with this office's obligations under Rule 11 of the Federal Rules of Civil Procedure, we need time to investigate the allegations of the complaint. In this regard, we need to access client documents from six different dates, as each plaintiff's allegations arise out of a different event. It is our understanding that plaintiffs' counsel does not yet have documentation either.

No previous request for an extension has been made by defendant City of New York, Commissioner Raymond Kelly or the New York City Police Department. Accordingly, we respectfully request that these defendants' time to answer or otherwise respond to the complaint be extended to June 6, 2008.

It is our understanding from plaintiffs' counsel that the Court has set a conference in this matter for April 9, 2008 at 4:00 P.M. As we believe that a conference would be more productive after we have conducted our investigation and responded to the complaint, we also respectfully request that the scheduled conference be adjourned until a date at the Court's convenience after June 6, 2008.

Thank you for your consideration herein.

Respectfully submitted,



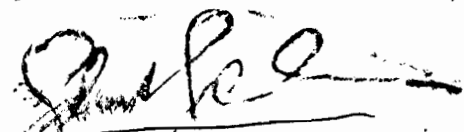
Mark D. Zuckerman
Senior Counsel

cc: David Rankin, Esq. (Via Facsimile)

Defendants' request is granted. Their
time to respond to the Complaint is
extended to June 6, 2008. This
extension will not affect the scheduling
of the initial conference.

SO ORDERED

Date: New York, New York
March 28, 2008


Shira A. Scheindt
U.S.D.J.